

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION  
CORPORATION,**

Plaintiff-Applicant,

v.

**BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,**

Defendant.

In re:

**BERNARD L. MADOFF,**

Debtor.

**IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC, and Bernard L. Madoff,**

Plaintiff,

v.

**THE ESTATE (SUCCESSION) OF DORIS  
IGOIN, LAURENCE APFELBAUM,  
individually and in her capacities as executor  
and beneficiary of the Estate (Succession) of  
Doris Igoin, and EMILIE APFELBAUM,**

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04336 (SMB)

**NOTICE OF WITHDRAWAL OF APPLICATION TO FILE JURISDICTIONAL  
MEMORANDUM OF LAW IN FURTHER SUPPORT OF DEFENDANTS' MOTION TO  
DISMISS AND DECLARATION OF JONATHAN K. COOPerman UNDER SEAL**

**PLEASE TAKE NOTICE** that Defendants The Estate (Succession) of Doris Igoin, Laurence Apfelbaum, individually and in her capacities as executor and beneficiary of the Estate (Succession) of Doris Igoin, and Emilie Apfelbaum (collectively, "Defendants") hereby withdraw, without prejudice, their Application to File Defendants' Jurisdictional Memorandum of Law in Further Support of Defendants' Motion to Dismiss and the Declaration of Jonathan K.

Cooperman Under Seal. The Application was filed on June 20, 2014 and was ascribed Docket No. 90.

To:  
BAKER & HOSTETLER LLP  
David J. Sheehan  
Tracy Cole  
Ona T. Wang  
M. Elizabeth Howe  
David McMillan  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC, and Bernard L. Madoff*

Dated: June 23, 2014

**KELLEY DRYE & WARREN LLP**

By: s/ Jonathan K. Cooperman  
Jonathan K. Cooperman  
Jessica L. Klarfeld  
101 Park Avenue  
New York, New York 10178  
(212) 808-7800

*Attorneys for Defendants The Estate  
(Succession) of Doris Igoin, Laurence  
Apfelbaum, and Emilie Apfelbaum*